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21 *Liberty Media Corporation and*

22 *Las Vegas Grand Prix, Inc.*

23 **UNITED STATES DISTRICT COURT**

24 **DISTRICT OF NEVADA**

25 MARVIN CUTCHINS, individually; RAY
26 CHARLES, JR., individually,

27 Plaintiff,

28 v.

LIBERTY MEDIA CORPORATION d/b/a
22 FORMULA ONE HEINKEN SILVER LAS
23 VEGAS GRAND PRIX, a foreign corporation;
24 TAB CONTRACTORS, INC., a domestic
corporation; LAS VEGAS GRAND PRIX,
INC., a corporation; DOE INDIVIDUALS 1-
20, inclusive; and ROE CORPORATIONS 1-
20, inclusive,

26 Defendant.

27 Case No. 2:24-cv-00048-APG-EJY

28 **STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO
RESPOND TO COMPLAINT**

(First Request)

1 Pursuant to Local Rule IA 6-1, 6-2 and LR 7-1, the undersigned counsel of record for Plaintiffs
2 and Defendants Liberty Media Corporation (“Liberty”) and Las Vegas Grand Prix, Inc. (“LVGP”) hereby
3 STIPULATE to extend the time for Defendants to answer or move in response to Plaintiffs’ complaint.
4 Defendants’ current deadline to answer or move in response to the complaint is January 19, 2024. If
5 approved, Defendants’ new deadline will be February 2, 2024.
6

7 The reason for the requested extension is that Liberty is a defendant in a related case. *See Raddue,*
8 *et al. v. Liberty Media Corporation, et al.*, Case No. 2:23-cv-02124-GMN-EJY. Liberty filed a notice of
9 related cases in both actions on January 5, 2024, *see Raddue*, ECF No. 13; *Cutchins* ECF No. 7, wherein
10 it advised of the potential the cases could be consolidated. Indeed, Plaintiffs’ counsel in *Raddue* have now
11 advised Liberty and LVGP’s counsel that they intend to file a motion to consolidate this action with
12 *Raddue* during the week of January 15, 2024. Liberty and LVGP’s counsel contacted Plaintiffs’ counsel
13 in this case to discuss the related cases, the potential for consolidation, and related matters to promote
14 efficiency between the cases and judicial economy. Because a portion of Plaintiffs’ legal team is currently
15 out of the country until January 23, 2024, Plaintiffs are unable to take a position on consolidation and the
16 related issues at this time. Without prejudicing Plaintiffs’ positions on these matters, the parties did agree
17 to a two-week extension of time for Defendants to answer or respond to the complaint. The extension
18 will permit the rest of Plaintiff’s legal team to return to the office and evaluate these issues, after which
19 the parties can again meet and confer about the best way to proceed.
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1 This is the first stipulation to extend the subject deadline. The parties submit that the request is
2 made in good faith and not for purposes of delay.
3

4 DATED this 16th day of January, 2024.
5

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36 *Attorneys for Defendants*
37 *Liberty Media Corporation and*
38 *Las Vegas Grand Prix, Inc.*

39 **IT IS SO ORDERED:**

40 
41 Clayton J. Zouchal
42 UNITED STATES MAGISTRATE JUDGE

43 Dated: January 16, 2024